REMARKS/ARGUMENTS

1.   Summary of the Office Action

Claims 1-82, 89-98, and 105-114 stand rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by U.S. Patent No. 6,704,024 (hereinafter Robotham).

2.   Response to 35 U.S.C. § 102 Rejections

Claims 1-82, 89-98, and 105-114 stand rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by Robotham. The applicants contend that each and every element of the present claim is not found in Robotham. To anticipate a claim, the reference must teach every element of the claim. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, USPQ2d 1051, 1053 (Fed. Cir. 1987).

Robotham discloses a method for displaying visual content on a client device. However, Robotham fails to teach or even suggest each and every element of the present claim 64, wherein claim 64 recites:

> *64.   A machine readable medium containing executable computer program*
> *instructions which when executed by a data processing system cause said system to*
> *perform a method to serve Internet content, the method comprising:*
> *receiving at a server from a remote device a first request for a first web page;*
> *rendering a first portion of a first image of the entire first web page from information*
> > *defining the first web page;*
> *selectively transmitting from the server to the remote device in a compressed format the*
> > *first portion of the first image of the entire first web page for display on a display*
> > *of the remote device;*

> receiving, at the server from the remote device, data indicating user input to display a
>> second portion of the first image of the entire first web page on the remote device;
> rendering the second portion of the first image of the entire first web page from the
>> information defining the first web page;
> responsive to the data indicating the user input to display the second portion,
>> transmitting from the server to the remote device in a compressed format the
>> second portion of the first image of the entire first web page only when the second
>> portion of the first image has not been transmitted from the server to the remote
>> device;
> wherein at least one of the first and second portions of the first image is rendered at the
>> server from information including text.

Robotham actually teaches away from the present invention and certainly does not anticipate it. In particular, Col. 28, lines 42-52 of Robotham states that "providing the client display function while receiving additional levels of a multi-level set of bitmaps improves perceived user responsiveness. The user can assimilate information provided in the overview representation and to make decisions based on this information while additional bitmaps are transmitted. For example, if the client 24 user decides not to view any intermediate or detail representations after viewing the associated overview representation, transmission of the subsequent levels can be stopped."(Emphasis added) It will be noted that Robotham teaches that the additional bitmaps are continuously transmitted unless the user specifically decide to stop the transmission of the additional bitmaps. Therefore, Robtham clearly contradicts with the presently claimed feature of "transmitting from the server to the remote device in a compressed format the second portion of the first image of the entire first web page only when the second portion of the first image has not been transmitted from the server to the remote device".(Emphasis added) Consequently, claim 64 is patentable over Robotham.

Independent claims 10, 22, 31, 43 and 52 include s limitation which is similar to the presently claimed feature of claim 64 as described above. Therefore, claims 10, 22, 31, 43 and 52 and their dependent claims are patentable over Robotham for the same reasons as established.

In addition, Robotham does not show each and every aspect of claim 73. Claim 73 recites

73.   *A method to view Internet content, the method comprising:*

sending from a device to a remote server a request for a web page;

receiving at the device from the remote server in a compressed format at least a portion
of an image of the entire web page, the portion of the image being rendered at the
remote server from information including text;

selectively displaying the portion of the image on a display of the device according to a
user input to the device; and

automatically displaying the portion of the image on the display of the device in response
to a user input to return to the web page.

It will be noted that claim 73 includes the feature of "automatically displaying the portion of the image on the display of the device in response to a user input to return to the web page" which is not disclosed in Robotham. The Office Action asserts on page 28 that Robotham discloses a feature whereby a user can scroll to a different tiled image based on a selection by the user and therefore, teaches the presently claimed feature. However, this assertion is incorrect. Robotham discloses that "to aid the user in navigating among bitmaps, the overview bitmap is displayable in its entirety within the allocated client viewport 16 and thus is a single tiled image. The user may select one of the bitmaps for display by pointing to a location on the overview bitmap" (Robotham, Col. 16, lines 61-65). Stated differently, Robotham does not teach that the portion of the image is *automatically displayed* on the device in response to a user input to *return to the webpage*. Instead, Robotham teaches that in order to display specific portion of a webpage, the user has to select the specific location of the webpage relating to the portion. Merely selecting a return to the web page does not automatically cause the portion of the image to be displayed. Consequently, claim 73 is clearly distinguishable from Robotham.

Similarly, Robotham fails to teach each and every element of claim 78, wherein claim 78 recites:

78. A method to serve Internet content, the method comprising:

> *storing on a server information about a plurality of frequently visited locations of a web*
> *page for a remote device, the plurality of frequently visited locations being*
> *identified through user inputs to the remote device;*
> *receiving at the server from the remote device a request for the web page;*
> *rendering at least a portion of an image of the entire web page from information defining*
> *the web page, the portion of the image including the plurality of frequently visited*
> *locations;*
> *transmitting in a compressed format the portion of the image from the server to the*
> *remote device in response to the request for the web page.*

In particular, the Office Action relies on Col.12, lines 49-69, Col. 20, lines 1-29 and Col. 28, lines 7-12 to teach the presently claimed feature of "storing on a server information about a plurality of frequently visited locations of a web page for a remote device, the plurality of frequently visited locations being identified through user inputs to the remote device". However, this assertion is incorrect. Indeed, Robotham fails to mention storing "a plurality of *frequently visited locations* of a webpage for a remote device". At best, Robotham only discloses maintaining "a central set of bookmarks which refer to specific visual content elements and/or constituent components" (Robotham, Col.12, lines 57). Therefore, claim 78 is patentable over Robotham.

Independent claims 94 and 110 contain the same feature of claim 78. Accordingly, claims 94, 110 and their dependent claims are patentable over Robotham for the same reasons as established above.
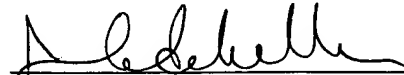
3. <u>Conclusion</u>

Having tendered the above remarks and amended the claims as indicated herein, the Applicants respectfully submit that all rejections have been addressed and that the claims are now in a condition for allowance, which is earnestly solicited.

If there are any additional charges, please charge Deposit Account No. 02-2666. If a telephone interview would in any way expedite the prosecution of the present application, the Examiner is invited to contact Jaina Chua at (408) 720-8300.

Respectfully submitted,

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